

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JERRY PINNELL, JEREMY FERNANDEZ)
AND SHANE PERRILLOUX, individually)
and on behalf of all others similarly situated,)

Plaintiffs,)

v.)

TEVA PHARMACEUTICALS USA, INC.,)
BOARD OF DIRECTORS OF TEVA)
PHARMACEUTICALS USA, INC., TEVA)
PHARMACEUTICALS USA, INC.)
INVESTMENT COMMITTEE, and JOHN)
AND JANE DOES 1-30.)

Defendants.)

**CIVIL ACTION NO.:
2:19-CV-05738-MAK**

**PLAINTIFFS' RENEWED MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND A LEAD PLAINTIFF
CASE CONTRIBUTION AWARD**

Named Plaintiffs Jerry Pinnell, Jeremy Fernandez, and Shane Perrilloux (collectively, "Plaintiffs"), participants in the Teva Pharmaceuticals Retirement Savings Plan (the "Plan") previously submitted for the Court's consideration, their Motion for an Award of Attorneys' Fees and Reimbursement of Expenses and A Lead Plaintiff Case Contribution Award (ECF 76) with an accompanying memorandum (ECF 76-1) and declarations (ECF 77 through ECF 77-5). The Court held a public hearing on May 3, 2021 on Plaintiffs' motion. Plaintiffs' motion was denied without prejudice.

Accordingly, Plaintiffs now respectfully submit the Renewed Motion for an Award of Attorneys' Fees and Reimbursement of Expenses and A Lead Plaintiff Case Contribution Award ("Fee Motion") and respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys' fees in the amount of \$849,915.00 which represents 33 1/3% of the settlement amount;

2. Directing reimbursement to Class Counsel in the amount of \$13,745.77 of expenses incurred in the prosecution of the action;

3. Awarding case contribution award of \$15,000.00 to each of the three Named Plaintiffs (Jerry Pinnell, Jeremy Fernandez, and Shane Perrilloux); and

4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto.

The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Memorandum of Law in Support of Plaintiffs' Renewed Motion For Award of Attorneys' Fees and Expenses, and Case Contribution Awards;

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs' Renewed Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for the Class Representatives;

C. Declaration of Christopher Battista, Esquire of the Law Firm of S&G;

D. Declaration of Named Plaintiff Jerry Pinnell In Support of Renewed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and

E. Declaration of Named Plaintiff Jeremy Fernandez In Support of Renewed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.

F. Declaration of Named Plaintiff Shane Perrilloux In Support of Renewed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.

DATED: May 14, 2021

Respectfully submitted,

/s/ Mark K. Gyandoh

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Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2021, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.